

**REMARKS**

**I. Introduction**

Pending claims 1-20 have been examined. Claims 1-13, 15-17 and 19-20 are rejected.

Specifically, claims 1-2 and 6-7 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 6,118,784 to Tsuchiya et al. (hereinafter “Tsuchiya”) in view of U.S. Patent No. 6,233,234 to Curry et al. (hereinafter “Curry”); claims 3 and 5 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Tsuchiya and Curry, as applied to claim 1, and further in view of U.S. Patent No. 6,775,267 to Kung et al. (hereinafter “Kung”); claim 4 is rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Tsuchiya and Curry, as applied to claim 1, and further in view of U.S. Patent No. 6,104,704 to Buhler et al. (hereinafter “Buhler”); claims 8-11 (sic: claims 8-13 and 15-17) are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Curry in view of Kung; claim 19 is rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Curry in view of U.S. Patent No. 6,701,437 to Hoke et al. (hereinafter “Hoke”); and claim 20 is rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Curry and Hoke, as applied to claim 19, and further in view of Kung (Office Action: pages 2-12).

Additionally, the Examiner objects to claims 14 and 18 but acknowledges that these claims contain allowable subject matter (Office Action: page 12).

## **II. Allowable Subject Matter**

Claims 14 and 18 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

Applicant withholds rewriting claims 14 and 18 in independent form at this time pending the Examiner's consideration of and response to the reasons for traversal of the current grounds of rejection set out below.

## **III. Claim Rejections -- 35 U.S.C. § 103(a)**

As noted above, claims 1-13, 15-17 and 19-20 stand rejected under § 103(a). As an initial matter, Applicant cosmetically amends claims 1-3, 5-13, 15 and 17-20 to further clarify the features recited therein by correcting various grammatical and syntactical errors. It is respectfully submitted that these amendments are not intended to narrow the scope of the original claims, but are rather for precision of language and to explicitly recite within the claim what was believed to have already been implicitly defined therein. Accordingly, these amendments do not foreclose application of reasonable equivalents.

### *A. Claims 1-2 and 6-7*

Claims 1-2 and 6-7 stand rejected under § 103(a) as allegedly being unpatentable over Tsuchiya in view of Curry.

Claim 1 is directed to a network system and recites, *inter alia*, that "an IP packet according to a service requested by a terminal is sent to a service provider through a plurality of

IP networks different from each other in protocol and the service is supplied to the terminal through the utilization of an IP packet transmitted from the service provider to the plurality of IP networks.” The network system of claim 1 comprises “packet exchange means, provided between the IP networks, for converting the format of the IP packet to be sent between the IP networks, so as to match the format of an IP network as a send destination.”

Applicant amends claim 1 to further clarify that the “connection between the user terminal and the plurality of service providers is unified.”

Thus, the network system unifies connection between a user terminal and a plurality of service providers so as to provide a “single window” service for the end user using the services of many service providers, thereby increasing the convenience of the end user. The network system of claim 1 allows for the redundancy in contracting, billing and accessing equipment required for each service provider to be eliminated by addressing the different data formats supported by each of the different IP networks.

Conversely, Tsuchiya discloses a method of communicating between an IPv4 terminal and an IPv6 terminal, via an IPv4-IPv6 converting apparatus. In particular, Tsuchiya relates to the interconnection of IPv4 packets and IPv6 packets in an IP network that is managed by a single organization (*e.g.*, a company, a research institute, etc.). Unlike claim 1, however, the ability to interconnect services of different service providers with the user terminal is not disclosed. Instead, the conversion of the IPv4 and IPv6 packets disclosed in Tsuchiya merely

ensures that interconnection within the IP protocol can occur. Indeed, the Examiner acknowledges that Tsuchiya does not relate to service providers (Office Action: page 2).

The Examiner, however, alleges that Curry makes up for these deficiencies of Tsuchiya. To the contrary, Tsuchiya discloses secure LAN/Internet telephony for constructing/managing an IP telephony network (Curry: Abstract). In Curry, the Internet Service Provider (ISP) is only used as a medium for transmitting and receiving IP packetized voice data of a telephone call.

It is respectfully submitted that it would not have been obvious to one of ordinary skill in the art, as the time of Applicant's invention, to combine Tsuchiya and Curry in the manner proposed, as neither of these references relate a unified platform for the services of a plurality of service providers.

Therefore, claim 1 is not rendered obvious by the proposed combination of Tsuchiya in view of Curry. Consequently, 2 and 6-7 are patentable over the proposed Tsuchiya/Curry combination at least by virtue of their dependency.

*B. Claims 3 and 5*

Claims 3 and 5 stand rejected under § 103(a) as allegedly being unpatentable over Tsuchiya and Curry, as applied to claim 1, and further in view of Kung.

Kung fails to make up for the exemplary deficiencies set forth above for claim 1. Consequently, claims 3 and 5 are patentable over the proposed Tsuchiya/Curry/Kung combination at least by virtue of their dependency.

*C. Claim 4*

Claim 4 stands rejected under § 103(a) as allegedly being unpatentable over Tsuchiya and Curry, as applied to claim 1, and further in view of Buhler.

Buhler fails to make up for the exemplary deficiencies set forth above for claim 1. Consequently, claim 4 is patentable over the proposed Tsuchiya/Curry/ Buhler combination at least by virtue of its dependency.

*D. Claims 8-13 and 15-17*

Claims 8-13 and 15-17 stand rejected under § 103(a) as allegedly being unpatentable over Curry in view of Kung.

Applicant amends claim 8 to further clarify that “connection between the user terminal and the plurality of service providers is unified.” As noted above, Curry does not teach or suggest such a feature.

Furthermore, Kung does not make up for the deficiencies of Curry. Instead, Kung relates to the construction of an IP telephony network (Kung: col. 1, lines 10-15). In Kung, service providers, which are relaying a data transmission, are switched in response to a request from an end user of the communication to change the Quality of Service (QoS) in the communication, and Kung provides a related method for billing.

Kung fails to teach or suggest, for example, the unification of connection between a user terminal and a plurality of service providers and the unitary management of account information of the services provided to the user, as recited in claim 8.

*E. Claim 19*

Claim 19 stands rejected under § 103(a) as allegedly being unpatentable over Curry in view of Hoke.

Applicant amends claim 19 to further clarify that packet data transmission for receiving/sending services between a user terminal and a plurality of service providers or online entrepreneurs “is carried out using a plurality of virtual private network (VPN) platforms corresponding to the service providers.” For example and not by way of limitation, communication between the user terminal and a first service provider may use IP within IP as the VPN technique, and communication between the user terminal and a second service provider may use MPLS as the VPN technique.

It is respectfully submitted that Curry and Hoke, alone or in combination, fail to teach or suggest these features of claim 19.

*F. Claim 20*

Claim 20 stands rejected under § 103(a) as allegedly being unpatentable over Curry and Hoke, as applied to claim 19, and further in view of Kung.

Applicant amends claim 20 to further clarify that the conversion of packet data by the packet exchange is carried out using multi-protocol label switching protocol (MPLS) or IP within IP “based on the VPN platform corresponding to the service provider receiving/sending the packet data.”

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Attorney Docket No. Q64973

It is respectfully submitted that Curry, Hoke and Kung, alone or in combination, fail to teach or suggest these features of claim 20.

#### **IV. Formal Matters**

##### *A. Priority*

The Examiner fails to acknowledge Applicant's claim for foreign priority. Therefore, the Examiner is requested to formally acknowledge Applicant's claim for foreign priority in the next correspondence.

##### *B. Information Disclosure Statement*

The Examiner fails to provide a signed and initialed copy of the Form PTO/SB/08 submitted with the IDS filed on May 3, 2004. Therefore, the Examiner is requested to provide Applicant with such a signed and initialed copy of the Form PTO/SB/08 in the next correspondence.

##### *C. Drawings*

Applicant submits herewith replacement sheets for Figs. 5, 6A, 6B, 6C and 7, wherein a *Prior Art* legend is added to each of the aforementioned figures.

#### **V. Conclusion**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the

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Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned attorney at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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**AMENDMENTS TO THE DRAWINGS**

Applicant submits herewith replacement sheets for Figs. 5, 6A, 6B, 6C and 7, wherein a  
*Prior Art* legend is added to each of the aforementioned figures.

3 Replacement Sheets (for Figs. 5, 6A, 6B, 6C and 7).